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Ms. Marlene Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

FCC 11-184
CG Docket No. 10-51

February 16, 2012

Dear Ms. Dortch:

ASL Rose is a Deaf-owned, Deaf-run company based in Maryland. We have a website and a Facebook page, as well as Twitter. Our goal is to develop Deaf-friendly curriculum materials for Deaf learners in grades K to college. We also advocate for ASL and schools for the deaf. Being Deaf ourselves, we depend on video relay service for our business-related communications, as well as personal communications to friends and relatives.

We would like to comment on three areas of the Federal Communications Commission (FCC) proposal. The first area is Broadband Internet Affordability. ASL Rose is fully in favor of FCC proposal to establish a program to help all deaf and hard of hearing people obtain broadband Internet. There is a digital divide between the deaf and hearing communities, and having broadband Internet access helps a great deal to conquer the digital divide and evens the playing field for deaf and hard of hearing people. Broadband Internet provides deaf and hard of hearing people with email access, access to video relay services, and access to Internet itself. ASL Rose urges FCC to establish a program to help make broadband Internet access affordable for all deaf and hard of hearing Americans.

The second area is Video Relay Service (VRS) Access Technology Standards. ASL Rose is in favor of new technical standards because we would like all deaf and hard of hearing people to be able to go in any store fully confident that they can buy any VRS-related or telecommunications equipment and feel secure that no matter what the brand it is, all brands will work with each other. This is crucial, as it will help deaf and hard of hearing people with accessibility and its

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quality. Deaf and hard of hearing people want to feel that their rights as consumers are equal to that of hearing consumers. If hearing consumers currently are able to buy any telecommunications equipment and have them all work with each other easily, then the same should be true for deaf and hard of hearing people when they buy telecommunications equipment.

The third and final area is about proposed contract agreement between the deaf/hard of hearing person and the VRS company. ASL Rose is against that idea because such an arrangement would severely curtail the rights of deaf and hard of hearing consumers. In this scenario, the deaf/hard of hearing consumer would be entering a contract agreement without having tried out the services provided by the VRS company. In the event that the VRS provider isn't providing quality interpreting services or the consumer did not feel that the VRS provider was the right one for her/him, the consumer would be unable to switch to another VRS provider because of the contract. This is wrong and unacceptable. There are other and better ways to avoid fraud. Requiring a contract isn't one of them and should be rejected.

Thank you for taking our comments under consideration.

Sincerely,



E. Lynn Jacobowitz
President



Adonia K. Smith
Vice President